

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OHIO**

Sheldon Stein)	
Chapter 7 Trustee for the Bankruptcy Estate)	CASE NO. 1:20-cv-00998
of Yazmin Torres-Duqum)	
)	JUDGE DAVID A. RUIZ
Plaintiff,)	
vs.)	
)	<u>JOINT MOTION TO EXTEND</u>
University Hospitals Cleveland Medical)	<u>DISCOVERY</u>
Center)	
)	
Defendant.)	

Plaintiff Sheldon Stein, Chapter 7 Trustee for the Bankruptcy Estate of Yazmin Torres-Duqum (“Plaintiff”) and Defendant University Hospitals Cleveland Medical Center (“Defendant”)(collectively, the “Parties”) jointly request that the Court extend the current discovery deadline by 60 days, until August 12, 2022. In March, the Parties requested until June 13, 2022 to complete the depositions of the Defendants’ employees, and the Court granted that request.¹ The parties were then working to schedule the depositions. Unfortunately, that same month, Plaintiff’s counsel was unexpectedly unable to work for two weeks due to a medical condition, which further delayed scheduling. Shortly thereafter, the witnesses left the employ of University Hospitals, and although they have been cooperative, their new work schedule and employer, along with defense counsel’s many previously scheduled hearings, has made it impossible for defense counsel to find and provide available dates for the depositions to proceed

¹ This case was previously assigned to another judge, who ordered that the parties complete paper discovery and depose the plaintiff only and refrain from otherwise completing discovery until settlement discussions were exhausted. The parties participated in two mediations. The parties anticipate that the only discovery remaining is the depositions of these witnesses.

within the discovery period. Accordingly, the parties jointly and respectfully request an additional 60 days to complete discovery.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of June 2022, the foregoing was filed through the Court's CM/ECF electronic filing system. If a Party should not receive a copy through the Court's filing system, a copy of the forgoing will be sent via email upon Plaintiff's counsel of record.

/s/ David A. Campbell
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One of the Attorneys for Defendant